

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

***THIS DOCUMENT
RELATES TO ALL CASES***

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Michael Birrer, M.D., Ph.D.; Jeff Boyd, Ph.D.; Benjamin Neel, M.D., Ph.D.; and Ie-Ming Shih, MD, Ph.D.

3. Attached hereto as Exhibit A is a true and correct copy of the Deposition of Benjamin Neel, M.D., Ph.D., dated March 19, 2019.

4. Attached hereto as Exhibit B is a true and correct copy of the Deposition of Ie-Ming Shih, M.D., Ph.D., dated March 26, 2019.

5. Attached hereto as Exhibit C is a true and correct copy of the Deposition of Jeff Boyd, Ph.D., dated April 8, 2019.

6. Attached hereto as Exhibit D is a true and correct copy of the Deposition of Michael Birrer, M.D., Ph.D., dated March 29, 2019.

7. Attached hereto as Exhibit E is a true and correct copy of the Expert Report of Benjamin Neel, M.D., Ph.D., dated February 25, 2019.

8. Attached hereto as Exhibit F is a true and correct copy of the Expert Report of Ie-Ming Shih, MD, Ph.D., dated February 25, 2019.

9. Attached hereto as Exhibit G is a true and correct copy of the Expert Report of Jeff Boyd, Ph.D., dated February 25, 2019.

10. Attached hereto as Exhibit H is a true and correct copy of the Expert Report of Michael Birrer, M.D., Ph.D., dated February 25, 2019.

11. Attached hereto as Exhibit I is a true and correct copy of Excerpts of International Agency for Research on Cancer. (2012). Arsenic, Metals, Fibres and Dusts, Vol 100C, A review of human carcinogens. In IARC, *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans*. Lyon, France: World Health Organization.

12. Attached hereto as Exhibit J is a true and correct copy of Excerpts of IARC (2010) *Monographs on the Evaluation of Carcinogenic Risks to Humans*:

Volume 93 - Carbon Black, Titanium Dioxide, and Talc. Lyon, France:

International Agency for Research on Cancer.

13. Attached hereto as Exhibit K is a true and correct copy of Hill, *The Environment and Disease: Association or Causation*, Proc. Royal Soc. of Med. 1965;58(5):295-300.

14. Attached hereto as Exhibit L is a true and correct copy of the Expert Report of Christian Merlo, M.D., MPH, dated February 25, 2019.

15. Attached hereto as Exhibit M is a true and correct copy of the Expert Report of Jack Siemiatycki, MSc, Ph.D., dated November 16, 2018.

16. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

/s/ P. Leigh O'Dell
P. Leigh O'Dell

Dated: May 7, 2019